

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED 84
HARRISBURG, PA 8-3

AUG 29 2002

SHAWN JORDAN
PLAINTIFF,

ORIGINAL

MARY E. D'ANDREA, CLERK
Per 519
Deputy Clerk

V.

CIVIL NO. 1:00-CV-1387

ROBERT W. MEYERS,
SUPERINTENDENT, ET AL.
DEFENDENTS

Plaintiff Respond to Defendants Amended Motion for Summary Judgment
/which plaintiff submits as a affidavit

1. Defendants admended documents in support of their motion for summary judgement, the declaration of Robin Kerstetter. Mr.Kersterrer is not a named defendant in this case nor a expert. Any and all statements, testimony is irrelevant evidence and inadmissible.

A. Defendants would like this court to believe, that they moved plaintiff on their own free will or good doing. Plaintiff has 13 months before plaintiff comes up for parole, and one of the requirements to make parole is taking the sex offender program. Theses are the reason why plaintiff has been moved to BB Block.

B. Defendants did not state in their argument - that before plaintiff was transfer to BB Block or Administrative Custody, that plaintiff was housed in D-Housing Unit for no less then 10 months and more then Three years.

2. Once again there are not any Windows in the cell/rooms in D and A housing units. Defendants have not submitted any evidences to show other wise. Their are not any ceiling fans in operation on housing unit D and A, defendants have not submitted any evidences to show otherwise.

3. Besides lack of evidence in support of defendants claims, defendant Daniel Walls - Unit Manager has committed perjury, in defendants respond to plaintiff complaint (paragraph 12) defendants